



STATE OF WASHINGTON

MILITARY DEPARTMENT

Camp Murray • Tacoma, Washington 98430-5000

COMMAND POLICY MEMORANDUM

SAFO-OHS 2-95 (40a)

15 June 1995

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Hazard Communication Program

*1. APPLICABILITY. This Command Policy Memorandum applies to all activities of the Washington Army National Guard (WAARNG) and the Military Department, herein after referred to as "facilities."

*2. PURPOSE. The purpose of this Command Policy Memorandum is to ensure that the hazards of all chemicals in the work environment are evaluated, and that information concerning these hazards and appropriate protective measures is transmitted to all employers and employees.

*3. GENERAL INFORMATION. In order to comply with WISHA (WAC 296-62-054) and OSHA (29 CFR 1910.1200), Hazard Communication Standard, the following written Hazard Communication Policy has been established for the Washington Army National Guard. All work units of the Military Department will meet the criteria of the Hazard Communication Standard. This written program will be available in the Occupational Health Office and provided to each facility. It will also be provided to each employee or employee's designated representative upon request. This Command Policy Memorandum will be posted on the Safety Bulletin Board in every WAARNG facility.

a. The term "hazardous chemical" means any chemical which is a physical hazard or a health hazard. This definition includes all chemicals used in the workplace except as indicated in paragraph 3a(2) below.

(1) Hazardous chemicals include (but are not limited to) cleaners, solvents, welding supplies (including welding rods), fuels, lubricants, paints and additives.

(2) Chemicals not covered by the Standard include cosmetics, medications, food and food additives, distilled spirits, tobacco, untreated wood or wood products, and chemicals stored in the same quantities and used in the same way as they would be used in a normal household. Guidelines for determining whether chemicals are covered by the Standard are found in 29 CFR 1910.1200(b)(6) and in WAC 296-62-05403(6). (These references are available in the Occupational Safety and Health Office and in maintenance facilities of the Washington Army National Guard.)

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b. List of Hazardous Chemicals. A list of all known hazardous chemicals used or stored will be maintained in each facility. Each facility supervisor/OIC will provide the Occupational Health Specialist a copy of the inventory of hazardous chemicals known to be present in his/her work area. This list will be reviewed and updated annually, and will be forwarded to SAFO-OHS in October of each year.

(1) Supervisors will notify the Occupational Health Specialist whenever new chemicals are introduced into the work area.

(2) A Material Safety Data Sheet (MSDS) will be on site in the workplace before any new chemical is used.

(3) The list of hazardous chemicals will document the nomenclature, federal stock number, color (if applicable) and manufacturer's name. Include the quantity and location of the item. The same name must appear on the inventory as appears on the label and on the Material Safety Data Sheet.

c. Container Labeling.

(1) The supervisor will verify that all containers of hazardous chemicals which are received, used or stored in the facility have the following information on the label:

(a) Name of the chemical (must be the same as on the Material Safety Data Sheet and the chemical inventory).

(b) Appropriate hazard warning(s).

(c) Name and address of the manufacturer.

(2) The supervisor or lead person in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with generic labels which have a block for identity and a block for the hazard warning. For help labeling, contact the Occupational Health Specialist, DSN 323-8460 or commercial (206) 512-8460.

(3) Labels are not required for transfer containers if the product will be used by the employee making the transfer and will be consumed during that work shift.

(4) The labeling system will be reviewed and updated yearly during facility inspections.

d. Material Safety Data Sheet.

(1) An MSDS must be available for each chemical on your chemical list. In cases where there are two manufacturers for the same chemical, you must have the MSDS from both manufacturers for that chemical. (For example, if you have copy machine toners available made by Konica and Kodak, you will need an MSDS for each of those products.)

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(g) Emergency procedures to follow if the soldier/employee is exposed to these chemicals.

(h) How to read labels and review MSDSs to obtain appropriate hazard information.

(i) Location of MSDS file, hazardous chemical list and this written program.

(j) The presence and hazards of all chemicals contained within unlabeled pipes in the work area.

(3) Prior to introducing a new chemical hazard into any facility or work area, each soldier/employee potentially exposed will receive information as outlined above.

(4) After attending the training class, each soldier/employee will verify that he/she attended the training session and that he/she understands the agency's policy on hazard communication. Federal technicians will use DD Form 1556 to document such training. Others may use other modes of documentation such as sign-in rosters.

(5) This training will be repeated at least annually.

f. Hazardous Non-Routine Tasks.

(1) Periodically, soldiers/employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected soldier/employee will be given information by his/her supervisor about hazardous chemicals to which he/she may be exposed during such activity.

(2) This information will include:

(a) Specific chemical hazards.

(b) Protective/safety measures the soldier/employee can take.

(c) Measures the agency has taken to lessen the hazards, including ventilation, respirators, presence of another soldier/employee, and emergency procedures.

g. Informing Contractors.

(1) It is the responsibility of the Contracting Office of the United States Property and Fiscal Office (for federal contracts) and the Facilities Engineering Office and/or State Administrative Services (for state contracts) to provide contractors and their employees the following information:

(a) Hazardous chemicals to which they may be exposed while on the job site. A material safety data sheet for each of these chemicals will be provided to the contractor(s).

(2) The United States Property and Fiscal Office (USPFO) is responsible for ensuring that MSDSs accompanying each shipment are forwarded to the facilities.

(3) MSDSs for locally purchased items can be obtained by calling the manufacturer and requesting one. MSDSs must be furnished upon request. (Asking the vendor at the time of purchase will save you time later.)

(4) MSDSs may be photocopied.

(5) MSDSs for all chemicals to which soldiers/employees may be exposed must be available to all soldiers/employees during all work hours. Soldiers/employees must be trained to read the MSDSs and must be familiar with the information contained on them for the chemicals with which they work.

(6) The Safety Specialist will review incoming data sheets for new and significant safety information, while the Occupational Health Specialist will review the data sheets for new and significant health information. Any new information will be provided to the affected employees.

e. Employee Training and Information.

(1) The supervisor/commander/OIC of each facility is responsible for the employee training program and ensuring that all elements specified below are carried out. The Occupational Health Specialist will function as an advisor for this training.

(2) Before coming in contact with the hazard (and annually thereafter) each new soldier/employee will receive a health and safety orientation from his/her supervisor. This training will include:

(a) An overview of the requirements contained in the Hazard Communication Standard, WISHA 296-62-054/29 CFR 1910.1200.

(b) Hazardous chemicals present in the workplace.

(c) Physical and health effects of the hazardous chemicals, including the symptoms of overexposure.

(d) Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area (such as monitoring conducted by the agency, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).

(e) How to lessen or prevent exposure to these hazardous chemicals by using administrative control, work practice modification, or personal protective equipment.

(f) Steps the agency has taken to lessen or prevent exposure to these chemicals.

(b) Precautions/protective measures the employees may take to lessen the possibility of exposure.

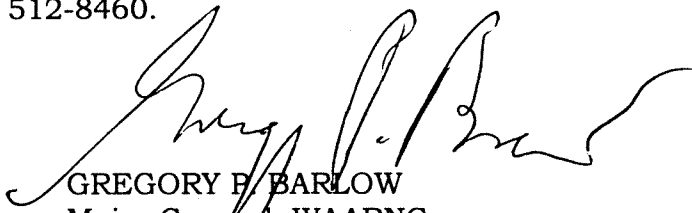
(c) Emergency procedures to be followed in case of an accidental release of hazardous chemicals.

(2) The facility supervisor will obtain from the contractor a list of hazardous chemicals which will be brought to the work site. This list will be given to the Occupational Health Specialist.

(3) The facility supervisor will further ensure that contractors and employees from other locations are informed of potential chemical hazards at their facility and of the labeling system used in the workplace.

4. This Command Policy Memorandum supersedes Command Policy Memorandum 11-93, SAB, dated 26 March 1993.

5. POC at this headquarters is MAJ McTurnal, Occupational Health Specialist, DSN 323-8460 or commercial (206) 512-8460.



GREGORY B. BARLOW
Major General, WAARNG
The Adjutant General

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